

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA                    )  
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JULIO SANTIAGO, et al.                    )

CRIMINAL NO.: 04-10336-NMG

**GOVERNMENT'S REQUESTED QUESTIONS FOR THE JURY VENIRE**

The United States of America, by and through Assistant United States Attorneys William F. Bloomer and Nancy Rue, hereby requests that, in addition to those questions commonly put to the venire in cases commenced in this Court, the Court pose the following questions to the prospective jurors in this case:

1. The United States of America is one of the litigants in this trial. You will hear the United States referred to throughout the trial as "the government." Have you, an immediate family member, or a close friend:

(a) ever been charged with a crime (other than a traffic violation)?

(b) ever filed a lawsuit or claim of any kind against a law enforcement officer?

(c) ever filed a lawsuit or claim against the federal government or one of its agencies? Have you ever been sued by the federal government or one of its agencies?

(d) ever had any involvement, of any sort, with a federal law enforcement agencies including the Internal Revenue Service?

(e) ever had any involvement, of any sort, with the Drug Enforcement Administration (DEA), the Bureau of Alcohol, Tobacco, and Firearms (ATF), or the Lowell, Leominster, Fitchburg, Dracut, Salem, Haverhill, Lawrence, or Chelmsford

Police Department, the Essex County Sheriff's Department, the New York City Police Department or the Massachusetts State Police?

(f) ever been arrested or detained by a law enforcement official without being charged with a crime?

(g) been employed by the United States Attorney's Office, the United States Probation Office, the United States Pre-Trial Services Office, the United States District Court Clerk's Office, the United States Marshal's Service, the DEA, ATF, the Lowell, Leominster, Fitchburg, Dracut, Salem, Haverhill, Lawrence, or Chelmsford Police Department, the Essex County Sheriff's Department, the New York City Police Department and/or the Massachusetts State Police?

2. Do you have feelings about the government that would in any way impair your ability to be a fair and impartial juror in this case?

3. There will be several agents and law enforcement officers called to testify in this case. Their testimony will reflect certain matters in this case as well as specialized knowledge and skills pertinent to this case. Would you believe or disbelieve the agent or officer simply because of that person's position as a law enforcement officer or government agent?

4. This is a case arising out of a narcotics investigation. Some of the witnesses expected to be called by the United States at trial are Special Agents of the Drug Enforcement Administration (DEA) and others will be Special Agents of the Bureau of Alcohol, Tobacco and Firearms. Have you or has anyone close to you had any experience with the DEA, ATF,

or other law enforcement agency that would prevent you from judging a law enforcement witness in the same way that you would judge any other witness?

5. Documents in this case may be presented on a screen for you to read. Do you have any difficulty reading or understanding English?

6. Do you have any strong feelings regarding the federal drug trafficking laws that would affect your ability to sit as a fair and impartial juror in this case?

7. Do you have any strong feelings regarding the federal gun control laws that would affect your ability to sit as a fair and impartial juror in this case?

8. Do you have any personal, religious, moral or philosophical beliefs that would prevent you from returning a verdict of guilty or not guilty against another person?

9 Do you know of any reason whatsoever why you cannot sit as a fair and impartial juror in the trial of this case?

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

BY: /s/ Nancy Rue  
WILLIAM F. BLOOMER  
NANCY RUE  
Assistant U.S. Attorneys

Dated: October 2, 2006

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Nancy Rue  
Nancy Rue  
Assistant United States Attorney

Date: October 2, 2006